

**BAKER & HOSTETLER LLP**

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Nicholas J. Cremona  
Christa C. Turner  
P. Alexander Quimby

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and for the Estate of Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

GUNTHER K. UNFLAT, individually and as joint  
tenant, and MARGARET UNFLAT, individually and  
as joint tenant

Defendants.

Adv. Pro. No. 10-05420 (SMB)

**AMENDED CASE MANAGEMENT NOTICE**

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures shall be due: December 21, 2015.
2. Fact Discovery shall be completed by: July 19, 2016.
3. The Disclosure of Case-in-Chief Experts shall be due: October 18, 2016.
4. The Disclosure of Rebuttal Experts shall be due: December 19, 2016.
5. The Deadline for Completion of Expert Discovery shall be: January 18, 2017.
6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before January 25, 2017.
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before February 8, 2017.
8. The Deadline for Conclusion of Mediation shall be: On or before June 8, 2017.

Dated: New York, New York  
November 13, 2015

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona

David J. Sheehan

Nicholas J. Cremona

Christa C. Turner

P. Alexander Quimby

45 Rockefeller Plaza

New York, NY 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and for the Estate of Bernard  
L. Madoff*

CHAITMAN LLP

By: /s/ Helen Davis Chaitman

465 Park Avenue

New York, New York 10022

Telephone: 888.759.1114

Facsimile: 888.759.1114

Helen Davis Chaitman

Email: [hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)

Leslie Treff

Email: [ltreff@chaitmanllp.com](mailto:ltreff@chaitmanllp.com)

*Attorneys for Defendants*